

**REMARKS**

Applicants hereby traverse the outstanding objections and rejections, and request reconsideration and withdrawal in light of the remarks contained herein. Claims 1-3, 6-13, and 16-19 are pending in this application.

**Objection to Specification**

The specification stands objected to as failing to provide proper antecedent basis for the claimed subject matter of claims 1 and 11, in particular, “for ... the step or means for ‘prohibiting said prospective entries from having said illegal values under normal program execution conditions.’” Office Action, page 2. Applicants, respectfully, traverse and assert that proper basis for the claimed subject matter is provided throughout the specification and can be found, for example, at page 5 lines 20-25, page 8 lines 21-22, page 9 lines 19-26, and page 10 lines 11-14. Accordingly, Applicants respectfully request that the objection be withdrawn.

**Objection to Drawings**

The drawings stands objected to because, according to the Examiner, “[t]he drawings must show every feature of the invention specified in the claims [including] the step or means for ‘prohibiting said prospective entries from having said illegal values under normal program execution conditions.’” Office Action, page 2. Applicants respectfully traverse and assert that the noted feature is illustrated in Figures 1 and 2. For example, Figure 1 illustrates the illegal state, Z 100 that incorporates a unidirectional arrow to the collection of legal states. Moreover, Figure 2 illustrates associative array 206, which the supporting specification describes may include illegal values which then prohibit prospective entries from having such values under normal conditions. These figures, as evidenced by their respective supporting descriptions, provide adequate support in the figures for the noted limitation. Accordingly, Applicants respectfully request that the objection be withdrawn.

**Non-Statutory Double Patenting**

Claims 1-3, 6-13, and 16-19 are rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1-16 of U.S. Patent No. 6,823,434. In response, Applicants will file a Terminal Disclaimer that will be in compliance with 37 C.F.R. 1.321(b), if this rejection still properly stands, upon an indication of allowability on all other matters. Therefore, Applicants respectfully submit that this rejection should be deferred until a later time.

**Claim Rejections under 35 U.S.C. § 102**

Claims 1, 2, 7, 8, 10-12, and 17-19 are rejected under 35 U.S.C. § 102(b) as being anticipated by *Miller* ('528, hereinafter *Miller*). Applicants traverse the rejection and assert the claims are allowable, at least, for the reasons stated below.

In order for a claim to properly stand rejected under 35 U.S.C. § 102, the reference must teach every element of the claimed invention. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." M.P.E.P. 2131, citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ...claim." M.P.E.P. 2131, citing *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989).

Claim 1 recites, in part, "writing illegal values to substantially all of said table entries in said fully associative table." *Miller* does not teach, at least, this element of claim 1. Instead, *Miller* teaches that, "at initialization ... all valid status bits are initialized to an invalid state." Col. 15, lns. 42-45. However, this is not the same limitation as the claimed limitation. Applicants assert that *Miller* does not teach an illegal value, but rather, it teaches an invalid state.

In order to aid the Examiner in understanding the above distinction, Applicants point out that *Miller*'s invalid state is defined as a non-current, old or stale state. Col. 15, lns. 19-23. *Miller*'s table entries become invalid during the normal course of program execution. Col. 3, lns 13-41. Therefore, *Miller*'s invalid value is a value which a prospective entry can

acquire during the normal course of program execution. On the other hand, an illegal value is defined in the present specification as “a value which a prospective entry would preferably not acquire in a normal course of program execution.” Page 8, lns. 21-22. Thus, *Miller* does not teach an illegal value, at least, because it does not teach a value which an entry does not acquire in a normal course of program execution. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection of claim 1.

In the last Office Action, the Examiner disagrees with the Applicant’s arguments because, according to the Examiner, “Miller teaches values which a prospective entry would preferably not acquired [sic] in a normal course of program execution.” Office Action, page 7. However, as noted above, *Miller* does not teach illegal values. Instead, *Miller* teaches invalid values which a prospective entry can acquire in a normal course of program execution. Col. 3, lns 13-41. Therefore, claim 1 is not anticipated by *Miller*. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection of claim 1.

Dependent claims 2, 7, 8, and 10 depend directly from base claim 1, and thus inherit all of its limitations. Therefore, Applicants respectfully submit that claims 2, 7, 8, and 10 are allowable, at least, for the reasons discussed above. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection of claims 2, 7, 8, and 10.

Claim 11 defines, in part, “means for writing illegal values to substantially all of said table entries in said fully associative table.” As noted above, *Miller* does not teach an illegal value, but rather, it teaches an invalid state. *Miller*’s table entries become invalid during the normal course of program execution. Col. 3, lns 13-41. Therefore, *Miller* does not teach an illegal value, at least, because it does not teach a value which an entry does not acquire in a normal course of program execution. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection of claim 11.

In the last Office Action, the Examiner disagrees with the Applicant’s arguments because, according to the Examiner, “Miller teaches values which a prospective entry would preferably not acquired [sic] in a normal course of program execution.” Office Action, page 7. However, as noted above, *Miller* does not teach illegal values. Instead, *Miller* teaches invalid values which a prospective entry can acquire in a normal course of program

execution. Col. 3, lns 13-41. Therefore, claim 11 is not anticipated by *Miller*. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection of claim 11.

Dependent claims 12, 17, and 18 depend directly from base claim 11, and thus inherit all of its limitations. Therefore, Applicants respectfully submit that claims 12, 17, and 18 are allowable, at least, for the reasons discussed above. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection of claims 12, 17, and 18.

Claim 19 defines, in part, “a force update command for causing said plurality of entry locations to acquire predetermined illegal bit values not present in prospective entries at ports connected to said fully associative table.” The Examiner cites col. 16, lns. 10-15 as teaching this limitation. However, at the cited passage, *Miller* only teaches a snoop/compare operation for identifying an invalid entry (i.e., an entry containing a non-current, stale or old value), and for setting a flag to indicate that the entry is invalid. Col. 3, lns. 21-24; col. 16, lns. 11-15. Applicants assert that that a force update command for causing a plurality of entry locations to acquire predetermined illegal bit values, as required by claim 19, is not the same limitation as an operation for identifying an invalid table entry and setting an invalid entry flag, as taught by *Miller*. Accordingly, *Miller* does not anticipate claim 19 and Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection of record.

In the last Office Action, the Examiner disagrees with the Applicant’s arguments because, according to the Examiner, “*Miller* teaches values which a prospective entry would preferably not acquired [sic] in a normal course of program execution.” Office Action, page 7. However, as noted above, *Miller* does not teach illegal values. Instead, *Miller* teaches invalid values which a prospective entry can acquire in a normal course of program execution. Col. 3, lns 13-41. Therefore, claim 19 is not anticipated by *Miller*. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection of claim 19.

### **Claim Rejections under 35 U.S.C. § 103**

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to

combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. § 2143. Without conceding the first or second criteria, Applicants assert the Examiner's rejections do not satisfy, at least, the third criteria.

### **Rejections over *Miller* in view of *Geva***

Claims 6, 9, and 16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Miller* in view of *Geva* ('541, hereinafter *Geva*). Applicants traverse the rejection and assert that the claims are allowable, at least, for the reasons stated below.

#### Claims 6 and 9

Claim 1 defines, in part, "writing illegal values to substantially all of said table entries in said fully associative table." As noted above, *Miller* does not teach or suggest, at least, this element of claim 1. Applicants assert that *Geva* does not teach or suggest this limitation either, and notes that the Examiner does not rely on *Geva* as doing so. Hence, the combination of *Miller* and *Geva* does not teach or suggest every limitation of claim 1. Claims 6 and 9 depend directly from base claim 1, and thus inherit all of its limitations. Therefore, the combination of *Miller* and *Geva* does not teach or suggest every limitation of claims 6 and 9. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 6 and 9.

#### Claim 16

Claim 11 defines, in part, "means for writing illegal values to substantially all of said table entries in said fully associative table." As noted above, *Miller* does not teach or suggest, at least, this element of claim 11. Applicants assert that *Geva* does not teach or suggest this limitation either, and notes that the Examiner does not rely on *Geva* as doing so. Hence, the combination of *Miller* and *Geva* does not teach or suggest every limitation of claim 11. Claim 16 depends directly from base claim 11, and thus inherits all of its limitations. Therefore, the combination of *Miller* and *Geva* does not teach or suggest every

limitation of claim 16. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claim 16.

### **Rejections over *Miller in view of Hale***

Claims 3 and 13 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Miller* in view of *Hale* ('317, hereinafter *Hale*). Applicants traverse the rejection and asserts the claims are allowable, at least, for the reasons stated below.

#### Claim 3

Claim 1 defines, in part, “writing illegal values to substantially all of said table entries in said fully associative table.” As noted above, *Miller* does not teach or suggest, at least, this element of claim 1. Applicants assert that *Hale* does not teach or suggest this limitation either, and notes that the Examiner does not rely on *Hale* as doing so. Hence, the combination of *Miller* and *Hale* does not teach or suggest every limitation of claim 1. Claim 3 depends directly from base claim 1, and thus inherits all of its limitations. Therefore, the combination of *Miller* and *Hale* does not teach or suggest every limitation of claim 3. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claim 3.

#### Claim 13

Claim 11 defines, in part, “means for writing illegal values to substantially all of said table entries in said fully associative table.” As noted above, *Miller* does not teach or suggest, at least, this element of claim 11. Applicants assert that *Hale* does not teach or suggest this limitation either, and notes that the Examiner does not rely on *Hale* as doing so. Hence, the combination of *Miller* and *Hale* does not teach or suggest every limitation of claim 11. Claim 13 depends directly from base claim 11, and thus inherits all of its limitations. Therefore, the combination of *Miller* and *Hale* does not teach or suggest every limitation of claim 13. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claim 13.

**Conclusion**

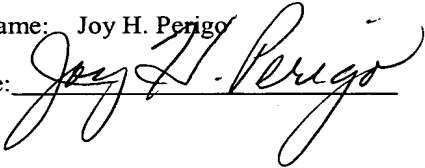
In view of the above remarks, Applicants believe that the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 08-2025, under Order No. 10971353-3 from which the undersigned is authorized to draw.

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Date of Deposit: 03-29-2005

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